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January 31, 2024

**VIA E-FILING ONLY**

The Honorable Nicholas G. Garaufis  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

RE: *Allstate Insurance Company, et al. v. Pierre, et al.*, No.: 1:23-cv-06572-NGG-LB (E.D.N.Y.)

Dear Judge Garaufis:

Plaintiffs Allstate Insurance Company, Allstate Indemnity Company, Allstate Property & Casualty Insurance Company, and Allstate Fire & Casualty Insurance Company (“Allstate”) respectfully submit this letter in connection with the above-referenced matter.

Plaintiffs intend to serve the defendants with a motion for default judgment and entry of final judgment as to Rutland Medical P.C. d/b/a MedicalNow (“Rutland”). Defendants Bradley Pierre and Medical Reimbursement Consultants Inc. intend to join in the motion for default judgment. Allstate proposes the following briefing schedule:

• Defendants’ opposition or otherwise join in relief due:	Four (4) weeks after service of motion
• Plaintiffs’ reply (if any) due:	Two (2) weeks after service of opposition
• Fully-briefed motion to be filed:	Two (2) weeks after service of opposition

Allstate respectfully requests an order adopting the proposed briefing schedule. To date, Allstate has not received any objections from the other defendants concerning the proposed briefing schedule.

Respectfully submitted,

*/s/ Michael W. Whitcher*

Michael W. Whitcher

**So Ordered.**

*/s/ Nicholas G. Garaufis*  
Hon. Nicholas G. Garaufis  
Date: 1/31/2024

cc: Counsel of record via CM/ECF only  
Rutland Medical P.C. d/b/a MedicalNow via UPS Next Day Air